

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re: Oleg Khutoretskiy
Debtor

In re: Irina Khutoretskaya
Debtor

Case Number 22-42697

Chapter 7

Notice of Motion for Relief from the
Automatic Stay and Affirmation in Support of Motion

PLEASE TAKE NOTICE that upon the annexed application of attorneys for JDRM LLC DBPP, SM, SKP & JD LLC (hereinafter "Secured Creditor") the undersigned respectfully moves this Court for an order, pursuant to 11 U.S.C. §362(d)(1) and (d)(2) and 11 U.S.C. § 1301, terminating the automatic stay herein as to the lien interest of Secured Creditor in real property of the debtor commonly known as 115 Baden Place, Staten Island, New York 10306 and such other and further relief as the Court may seem just and proper.

PLEASE TAKE FUTHER NOTICE that this motion shall be returnable on January 19, 2023 at 2:30 p.m. of that day, or as soon thereafter as counsel can be heard, before the Honorable Nancy Hershey Lord telephonically and by videoconference. All participants must register with eCourt Appearances in advance of all telephonic and videoconference appearances. eCourt Appearances registration is required by both attorneys and non-attorney participants. Those without CM/ECF accounts may access the program on the website at <https://ecf.nyeb.uscourts.gov/cgi-bin/nyebAppearances.pl>. Once registered, eCourt Appearances will email the telephone number and/or video link for your hearing. You may register for hearings weeks in advance, but the telephone number and/or video link will not be emailed to you until **48 hours before the hearing date**. Those registering with eCourt Appearances for hearings in less than 48 hours should allow up to 15 minutes after registration to receive the email with the telephone number and/or video link. Those unable to access eCourt Appearances must email Judge Nancy Hershey-Lord's Courtroom Deputy at: nhl_hearings@nyeb.uscourts.gov at least two (2) business days prior to the hearing. Your email must include your name, the case number(s), who you represent (if you are an attorney), hearing date, and phone number.

Telephonic Dial-In Instructions:

1. Dial in Number 888-363-4734
2. Access Code – 4702754
3. Announce who you are each time before speaking
4. Avoid the use of a speaker phone (use a landline if possible)
5. All persons not speaking should mute their phones
6. Speak up and enunciate so that you can be heard and understood.

PURSUANT TO BANKRUPTCY RULE 9014 AND LOCAL BANKRUPTCY RULE 9006-1(b), IF YOU INTEND TO OPPOSE THE MOTION, YOU MUST SERVE ON THE SECURED CREDITOR'S COUNSEL AND FILE WITH THE CLERK OF THE BANKRUPTCY COURT, WRITTEN OPPOSITION TO THE MOTION SO AS TO ENSURE ACTUAL RECEIPT NOT LATER THAN SEVEN (7) DAYS BEFORE THE RETURN DATE. IN THE EVENT NO WRITTEN OPPOSITION IS SERVED AND FILED, NO HEARING ON THE MOTION WILL BE HELD BEFORE THE COURT ON THE RETURN DATE, AND THE COURT WILL CONSIDER THE MOTION AS UNOPPOSED.

Dated: December 13, 2022
Rockville Centre, New York

Sheldon May & Associates, P.C.

/S/Ted Eric May, Esq.
Ted Eric May, Esq.
Attorneys for the Secured Creditor
255 Merrick Road
Rockville Centre, New York 11570
(516) 763-3200